



Channel Islands

CALIFORNIA STATE UNIVERSITY

Environmental, Health and Safety

Injury and Illness Prevention Program

For Compliance with:

**Title 8, California Code of Regulations
General Industry Safety Orders, Section 3203 (8 CCR 3203)**

Rev. 02/14/2020



Channel Islands

CALIFORNIA STATE UNIVERSITY
ENVIRONMENTAL, HEALTH AND SAFETY
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I. Purpose

It is the objective of California State University, Channel Islands (CSUCI) to maintain a safe and healthy environment for all faculty, staff, students, contractors and visitors. The CSUCI IIPP provides the framework and context for the University's overall health and safety program. All other safety programs and required training are governed by the principles set forth in the CSUCI IIPP. The University will establish and maintain a system of interactive policies, plans, programs, procedures and practices that are intended to help identify and control occupational hazards. Employees, students, and contractors will not be required to perform any work which will expose them to unreasonable danger or risk of injury or illness.

It is the position of CSUCI, insofar as is reasonable and practical, to ensure that employees know the hazards of their work activities and environment. The CSUCI IIPP is intended to inform all employees of safety precautions necessary to prevent or minimize occupational hazards. In addition, all University departments will provide facilities and equipment that meet all applicable federal, state and local regulations.

II. Scope

This program applies to all CSUCI employees. Although the regulations apply only to employees, the University is also committed to the health and safety of all students, contractors and visitors.

This IIPP applies to occupational hazards (physical, chemical, and biological) known to be present in the work place in such a manner that employees may be exposed under normal conditions or in foreseeable emergencies. Use of hazardous materials, repair of electrical devices, and repetitive motion tasks are examples of work that may present these types of hazards.

III. Objectives

In order to be effective, the CSUCI IIPP is designed as dynamic document to achieve the following objectives:

- Reduction of work-related injuries and illnesses, property loss and environmental impairment
- Development and implementation of safe and healthy work practices for each specific work task performed by university employees
- Communication of general health and safety rules and regulations to all University employees

- Adherence to disciplinary procedures as necessary to ensure that all health and safety rules and regulations are followed and enforced
- Proper maintenance of equipment as required
- Hazard recognition and correction through self-inspections
- Prompt investigation of hazardous conditions, workplace incidents (including near misses) and workplace injuries/illnesses

IV. Responsibilities

- **University President** – Has overall responsibility for injury and illness prevention and compliance with this IIPP Plan. The president will meet this responsibility by providing institutional support toward the execution and administration of this IIPP Plan. The president has delegated the actual administration of this Plan to the University’s Environmental Health & Safety (EHS) Office.
- **Deans, Department Chairs, Directors, Managers-** Have the responsibility to implement this IIPP Plan in their respective work areas. These responsibilities shall include, but are not limited to, the following duties:
 - Develop and maintain area-specific safety procedures.
 - Establish clearly outlined safety responsibilities in the job descriptions that govern their employees.
 - Instruct employees in the recognition and avoidance of unsafe acts and conditions, including hazards associated with non-routine tasks and emergency operations.
 - Develop and implement a specific training program designed to instruct employees in general safe work practices for their immediate area as well as instructions specific to their job duties. Such education and training shall take place prior to the employee being assigned any potentially hazardous work assignment.
 - Conduct and document periodic safety inspections of facilities, equipment and projects to identify unsafe conditions and practices.
 - Perform all necessary corrective actions as identified by safety inspections or department employee communications.
 - Inform affected employees of unsafe conditions that cannot be immediately corrected and/or post appropriate warning signs in those affected areas.

- Refer unsafe acts and conditions that cannot be corrected or addressed at the department level to the University EHS Office.
- Develop a method of communication where unsafe acts and conditions can be reported by employees without fear of reprisal and management can communicate safety information to all respective employees.
- Initiate disciplinary action, as defined in the applicable employee Memorandum of Understanding (MOU), to employees who fail or refuse to follow established university safety program requirements.
- Conduct and document preliminary investigations of all reported industrial injuries and illnesses.
- Maintain an inventory of all hazardous materials present in all work areas within the department
- Ensure that all hazardous materials and waste are properly labeled, stored and, as appropriate, identified for disposal.
- Ensure that all employees are provided with appropriate personal protective equipment (PPE) and are trained on the proper use and maintenance of such equipment.
- Ensure that all employees receive specific and periodic medical examinations that are applicable for their job description and meet mandated federal and state regulations.
- Maintain safety and health records including, but not limited to, training, periodic inspections, accident investigations, corrective action documents, and disciplinary documents consistent with the requirements of this document.

- **Director, Environmental Health and Safety (EHS):**

- Peer Gerber- Director, EHS, is responsible for developing, implementing and maintaining the CSUCI Injury & Illness Prevention Program (IIPP). This is accomplished by:
 - ✓ Assessing the need for, developing and maintaining other EHS programs as judged necessary through hazard analysis, relevant regulation and law, and good practice;
 - ✓ Assisting Departments in complying with IIPP requirements, including safety meetings, training and reporting programs, audits, and record keeping;
 - ✓ Monitoring activities, on a consultative basis, in the areas of chemical hygiene, emergency preparedness, fire safety, hazard communication, hazard identification; hazardous materials management, industrial hygiene, biological safety, occupational safety, public health and sanitation, and laser safety;

- ✓ Investigating employee complaints of hazardous conditions and referring findings to appropriate managers and supervisors;
 - ✓ Maintaining environmental and industrial hygiene monitoring records;
 - ✓ Maintaining employee exposure records, and
 - ✓ Providing access to records in accordance with Section X.
- **Human Resources**
 - Maintain all employee medical records, and
 - Provide access to records in accordance with Section X.
- **Department/Safety Coordinators**
 - Departments, through their Departmental Safety Coordinator if one exists, have the responsibility to implement local procedures to ensure effective compliance with the requirements of this IIPP and other Health and Safety programs that are applicable within their department.
 - Perform hazard assessments.
 - Identify and evaluate hazards whenever new substances, processes, procedures or equipment create a new hazard, or whenever the employer is made aware of a new or previously unrecognized hazard.
 - Utilize Job Safety Analysis for new, unusual, or high hazard work.
 - Respond to health and safety audits findings and document the responses.
 - Inform outside contractors who work under the Department's jurisdiction of the hazards to which their employees may be exposed;
 - Provide employees with information and training on hazards in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area. Inform employees of the hazards of routine tasks, non-routine tasks, and those foreseeable in emergency situations. Training should be communicated in a language readily understood by the employee(s);
 - Develop a system designed to encourage employees to inform their supervisors of hazards at the work site without fear of reprisal, and
 - Develop a system for ongoing safety training.
 - **Supervisors-** Supervisors play a crucial role in implementing the IIPP. They are responsible for the following:
 - Enforcing safe work practices and procedures
 - Implementing the training program designed to instruct employees and students in safe work practices and specific job duties
 - Instructing employees and students in the recognition and avoidance of unsafe conditions, including hazards associated with non-routine tasks and emergency operations

- Permitting only those employees or students qualified by training to operate potentially hazardous equipment and ensuring that employees or students understand all safety procedures associated with their job duties
- Investigating incidents and preparing written documentation
- Requesting a Safety Data Sheet when one is not already available for a hazardous material
- Correcting and/or reporting unsafe conditions or practices to their immediate supervisor
- Performing a hazard assessment for the particular work to be assigned, determining relevant safety programs, ensuring compliance with those safety programs, and ensuring employees are properly trained before work commences.
- Hazard assessment will be supplemented by a more formal Job Safety Analysis if there is any uncertainty how to perform work safely or if the work exposes employees to new or previously unrecognized hazard

- **Employees**

Employees are expected to actively participate in the development and implementation of the CSUCI IIPP. New employees must be given training on the basic elements of the IIPP by their supervisor prior to starting their work assignment. When employees are given work assignments for which training has not previously been received, training must be conducted. Employee responsibilities include:

- Using common sense and good judgement at all times
- Reading and complying with all procedures and guidelines provided by their supervisor, whether written or verbal
- Attending all assigned training sessions and complying with all applicable safety requirements
- Informing their supervisor of any workplace hazard without fear of reprisal
- Asking questions to their supervisor when there is any concern about an unknown or hazardous situation, including lack of training to perform a particular task
- Reporting any injury or illness immediately to their supervisor

V. Compliance

All employees are expected to adhere to safe and healthy work practices and to follow all applicable rules and regulations at all times. Non-compliance can result in disciplinary action up to and including employment termination.

Annually, campus managers may nominate for the Governor's Employee Safety Award those employees who have made exceptional contributions to safety and health in their work place. In addition to the annual award, managers are encouraged to recognize employees who follow safe and healthful work practices. The method of recognition shall be determined by the department administrator.

VI. Communication

The University utilizes the following methods for providing communication with employees on occupational health and safety matters:

Emergency Procedures- Emergency procedures are posted at various locations throughout the University.

Safety Meetings - The University has a campus-wide University Safety Committee that meets regularly.

EHS Website- CSUCI EHS has established a web page with the following information:

- Written safety and environmental programs
- Environmental, Health and Safety training information
- University Safety Committee Minutes
- Policy Statement on Occupational Safety
- Accident and Injury reporting procedure
- EHS contact information

Department Safety Meetings- Departments should schedule regular meeting in which safety and health issues may be freely and openly discussed by departmental employees. These meetings can be incorporated into existing department meetings (e.g. staff meetings).

Employee Safety Training- CSUCI offers safety training programs for employees on a regular basis (see Section VIII). Topics include, but are not limited to, ergonomics, emergency procedures, hazard communication, and defensive driving training. Departments should also provide specific environmental, health and safety training programs to their employees prior to assignment to a new job and when work assignments change.

Tailgate Safety Meetings- Tailgate safety meetings are conducted on a regular basis in Facilities Services. These short meetings are designed to focus on current safety issues, such as those related to an ongoing project or recent incident. Employees are also given the opportunity to discuss safety concerns or ideas for improving the department's safety program.

VI. Workplace Hazard identification and Correction

CSUCI has established a several mechanisms for identifying and correcting occupational safety and health hazards including, but not limited to, the following:

Rev. 02/14/2020



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Hazard Identification

- The University maintains an EHS which has the responsibility for developing, implementing, and monitoring the effectiveness of safety and health programs;
- The EHS Office reviews applicable General Industry Safety Orders and other safety Orders that apply to CSUCI's operations;
- Departments and supervisors are responsible for identifying and evaluating hazards prior to assigning work or whenever new substances, processes, procedures or equipment create a new hazard, or whenever the employer is made aware of a new or previously unrecognized hazard.
- A Job Safety Analysis (form driven) is utilized for new work or work that may involve new or unusual hazards.
- Auditing and inspection program;
 - Investigation of occupational accidents, injuries, illnesses, and unusual events that have occurred at CSUCI;
 - Evaluation of concerns raised by employees during safety meetings; and
 - Evaluation of concerns reported to the EHS Office (including anonymous reports). The follow-up to these concerns is documented with a "Health and Safety Concern Report".
 - Chemical Hygiene Program Audit- Administered by the EHS office, this program focuses on laboratories that use hazardous materials, including biohazardous materials. Audits are conducted annually.
 - Department Safety Inspection Program- A self-inspection program conducted in high hazard activity areas (e.g. Biology, Chemistry, Physics, Art). Self-inspections are conducted annually and include all laboratories and work shop areas. Inspection documentation, including corrective actions, are reviewed during the EHS assessments.
- University managers or supervisors shall conduct periodic safety inspections of their facilities, equipment and projects to identify unsafe conditions and work practices. EHS will provide assistance and guidance on an as needed basis. Completed inspection records and any corrective action taken to rectify any unsafe condition shall be maintained by the appropriate manager for a minimum of 3 years.

- The Risk Manager shall conduct periodic inspections of general outdoor and indoor campus facilities and public access areas in order to assess, eliminate, mitigate and/or control risks.
- EHS shall conduct periodic audits of all department health and safety activities to ensure compliance with this and other applicable regulatory requirements.
- Departments are responsible for engaging and correcting EHS audit findings, and providing a written response to EHS regarding those corrections. A timeframe for implementing any corrective action(s) shall be included on the response and agreed upon by the department and EHS.
- Whenever a department adds, deletes or modifies a work task, material/product, piece of equipment or procedure that results in creating new or different exposure hazard(s), all affected employees must receive training specific to that hazard(s). The training must be provided prior to implementing the change and may be delivered by a qualified party determined by the department's manager or supervisor. Documentation of the training must be kept by the department for 30 years from the date of training.
- In addition to the periodic safety and health inspections conducted by each department, EHS will conduct specialized inspections. These inspections will typically be conducted as a result of a workplace accident or upon request. Upon completion of each inspection, EHS will provide a report, to the department administrator, of the observed deficiencies and recommendations for corrective action(s). The department administrator is responsible for completing the corrective action(s) and notifying EHS.

Hazard Correction

- Departments, managers and supervisors must properly address known hazards before work begins. Unsafe conditions that require repair work (i.e. uneven walking surface) shall be reported to Facilities Services at Ext. 8461. Repair requests that involve imminent safety hazards are given top priority.
- Every employee is responsible for maintaining a safe and healthful working environment for themselves and their fellow employees. Any unsafe condition shall be immediately reported to the immediate supervisor. At any time when any hazard which poses an imminent threat to life or health is identified during any safety inspection or otherwise becomes known, immediate corrective action shall be taken by the responsible manager.

- If any imminent threat cannot be immediately abated without endangering students, employees and/or property, all students and employees shall be evacuated from the area except those personnel who are trained and are necessary to correct the hazardous condition. A call to Public Safety shall be made at Ext. 8444. If the situation does not pose an immediate risk of personnel injury or death, a call shall be made to either the department supervisor or to Facilities Services at Ext. 8461.

VII. Occupational Injury/Illness Investigation

- For any emergency, defined as a life-threatening incident, a call to campus Public Safety shall be made immediately by dialing 911. As time permits, the employee's immediate supervisor or manager shall be contacted verbally.
- Non-emergency employee (non-life threatening) injuries/illnesses shall be immediately reported (verbally) to the employee's manager/supervisor.
- The injured employee's supervisor or manager shall complete the Supervisor's Injury or Illness Report Form and submit it to Human Resources within 24 hours of the reported injury.
- After reviewing this form, the Workers' Compensation office scans the document and uploads it online on a groupshare drive.
- The EHS Office reviews all posted incident reports and investigates all recordable injuries. An EHS investigation report, which includes a root cause analysis and recommendations to prevent injury/illness re-occurrence, will be sent to the employee's department for review and appropriate action.

VIII. Employee Safety Training

Effective dissemination of safety information is key to a successful Injury and Illness Prevention Program. Each employee's direct supervisor is responsible for ensuring that he/she has been trained in the following categories, as they apply to the employee's job assignment:

- **General Safe/Healthy Work Practices**
 - All new employees shall complete an Injury and Illness Prevention Program training course prior to starting their assigned job.
- **Safe Work Practices For Using Hazardous Materials**
 - The CSUCI Hazard Communication (Hazcom) Program, as outlined in the Hazcom Manual, satisfies this requirement. No employee is allowed to work with any

hazardous material unless he/she has received appropriate training as outlined in the Hazcom Program.

- **Safe Work Practices for Machinery and Equipment**

- Hazardous equipment for the purposes of this IIPP, is defined as any equipment that is not designed for general domestic use; has a high electrical potential; mechanical parts that move and have the ability to amputate body parts; can cause crushing injuries; or requires a high level of skill to operate.
- Managers and supervisors are responsible for training their employees on the safe use of equipment. No employee shall work with any hazardous equipment without receiving training as to the specific hazards of such equipment. Employees who are required to work with hazardous equipment who have no prior experience with the safe and proper use of the equipment must attend an equipment-specific training course, or be instructed in its safe use by someone trained and skilled in the operation of that equipment. Verification that the employee has received such training shall be in writing.
- No employee is allowed to work with any hazardous equipment unless he/she has received appropriate training as outlined by the equipment's user or safety manual provided by the manufacturer.
- Managers and supervisors are responsible for ensuring that employees are trained whenever new substances, processes, procedures, or equipment are introduced to the work place and represent a new hazard and whenever the manager or supervisor receives notification of a new or previously unrecognized hazard. Managers and supervisors are to familiarize themselves with the safety and health hazards to which employees under their direction may be exposed.

- **Specific Hazardous Situations**

- Confined space entry, trenching, live electrical work, etc., are all examples of specific hazardous situations. An employee involved in work of this type must follow the guidelines provided in the IIPP and specific safety procedures for each situation. Managers and supervisors are responsible for ensuring that safe work practices are followed for any potentially hazardous work situation.
- Each manager or supervisor is responsible for ensuring that their direct employees receive the necessary training to perform their job safely.
- The CSUCI EHS Office also provides safety training on a regular basis. Dates, times, and course overviews for specific health and safety training sessions can be found by contacting the EHS office at Ext. 3550.

- **Hazardous Substances**

Rev. 02/14/2020



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- Training is to be provided on a one-on-one basis, between the employee and supervisor by reviewing the Safety Data Sheet (SDS) for pertinent safety information. Each training session shall be documented. New users of hazardous materials must first complete the Hazard Communication Program training course.
- **Processes**
 - The term “Process” applies to the production of a product. Since hazardous materials at CSUCI are not used to produce a material product, CSUCI does not conduct “processes” or in any way simulate production processes.
- **Procedures**
 - It is the responsibility of the EHS Office to provide general health, safety and environmental programs for the campus community. Individual Departments must comply with all applicable University environmental, health and safety programs. The EHS Office does not provide formal training on all of these programs but will assist with implementation. Departments should request training assistance if they do not clearly understand what is expected by a program. Certain campus departments are audited annually by the EHS Office for compliance with these programs.
- **New Equipment**
 - Each Department is responsible for ensuring that each user of any new “hazardous equipment” has been appropriately trained.
 - The EHS Office will audit the effectiveness and thoroughness of such training. The criteria for evaluating the effectiveness of this training are based on:
 - 1) Documentation that training has been given;
 - 2) Injuries associated with the use of the equipment, and
 - 3) Interviews with the equipment user to assess operational skill and personal knowledge of applicable safety precautions.

IX. Recordkeeping

Cal-OSHA regulations require maintenance and retention of records for occupational injuries and illnesses, medical surveillance, exposure monitoring, inspections and other activities relevant to occupational health and safety.

Records listed below shall be maintained for the following periods:

- Employee exposure records 30 years
- Employee medical records 30 years
- Environmental monitoring records 30 years
- Safety training, safety meetings, safety audits, etc. 3 years
- Incident, injury and and illness reports 5 years

Records required by Cal-OSHA will be maintained as follows:

- The EHS office will maintain environmental monitoring records and employee exposure records;-
- Departments will maintain records of safety training, safety meetings, safety audits, etc. Original documents or facsimiles of the original documents must be maintained to meet the requirements of this Section. Other methods of record keeping or tracking, such as computer databases, may be used only as supplements.

X. Access to Exposure and Medical Records

Upon request, EHS provides access to information considered pertinent to an employee's workplace exposure, as well as medical monitoring records related to potential toxic substances or harmful physical agents including, but not limited to, the following:

- Workplace monitoring or measurement;
- Biological monitoring results which assess the absorption of a substance by body systems;
- SDS's, or if these are not available, any other information which reveals the identity of a toxic substance or harmful physical agent.
- Respirator medical clearances
- Respirator fit tests
- Hearing test results as required in the Hearing Conservation Program

The EHS Office will make a copy of this IIPP available upon request to CSUCI employees, employees' designated representatives, and appropriate regulatory agencies.

XI. References

California labor Code Section 6401.7 (Chapters 1369, Statutes 1989); California Code of Regulations, Title 8, Section 3203,2304.

XII. Administering Agency

California Division of Occupational Safety and Health, Department of Industrial Relations (Cal-OSHA).